

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
THE ANNUITY, WELFARE, APPRENTICESHIP SKILL
IMPROVEMENT & SAFETY FUNDS of the
INTERNATIONAL UNION OF OPERATING ENGINEERS,
LOCAL 15, 15A, 15C and 15D, AFL-CIO by its TRUSTEES
JAMES T. CALLAHAN, LYNN A. MOUREY,
ROBERT SHAW and RUSSELL SHAW, and JOHN and
JANE DOE, as Beneficiaries of the ANNUITY, WELFARE,
APPRENTICESHIP SKILL IMPROVEMENT & SAFETY
FUNDS of the INTERNATIONAL UNION OF OPERATING
ENGINEERS, LOCAL 15, 15A, 15C and 15D, AFL-CIO,

**REQUEST TO CLERK
FOR ENTRY OF DEFAULT**

07-CIV-9906 (TPG)

Plaintiffs,

-against-

MODERN CONTINENTAL CONSTRUCTION CO., INC.,

Defendant.
-----X

TO: J. MICHAEL McMAHON, Clerk of the United States District
Court for the Southern District of New York

Please enter the default of Defendant MODERN CONTINENTAL CONSTRUCTION CO.,
INC. pursuant to Rule 55(a) of the Federal Rules of Civil Procedure for its failure to plead or
otherwise defend the above-entitled action as fully appears from the court file herein and from the
attached Affidavit of James M. Steinberg, sworn to on January 29, 2008.

Dated: Hastings-on-Hudson, New York
January 29, 2008

BRADY MCGUIRE & STEINBERG, P.C.

By: 

James M. Steinberg (JS-3515)
Attorneys for Plaintiffs
603 Warburton Avenue
Hastings-on-Hudson, New York 10706
(914) 478-4293

TO: MODERN CONTINENTAL CONSTRUCTION CO., INC.
175 Purchase Street
Boston, MA 02110